

CAHILL GORDON & REINDEL LLP
JOEL KURTZBERG (admitted *pro hac vice*)
FLOYD ABRAMS (admitted *pro hac vice*)
JASON ROZBRUCH (admitted *pro hac vice*)
32 Old Slip
New York, New York 10005
Phone: 212-701-3120
Facsimile: 212-269-5420
jkurtzberg@cahill.com

DOWNEY BRAND LLP
WILLIAM R. WARNE (SBN 141280)
MEGHAN M. BAKER (SBN 243765)
621 Capitol Mall, 18th Floor
Sacramento, CA 95814
Phone: 916-444-1000
Facsimile: 916-520-5910

Attorneys for Plaintiff X Corp.

STIPULATION FOR X CORP. TO JOIN
SUMMARY-JUDGMENT BRIEFING SCHEDULE

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
SACRAMENTO DIVISION

CHRISTOPHER KOHLS,
Plaintiff,
v.
ROBERT A. BONTA, et al.,
Defendants.

Case No. 2:24-cv-02527-JAM-CKD

**STIPULATION FOR X CORP. TO JOIN
SUMMARY-JUDGMENT BRIEFING
SCHEDULE**

Judge: John A. Mendez

THE BABYLON BEE, LLC, et al.,
Plaintiffs,
v.
ROBERT A. BONTA, et al.,
Defendants

Case No. 2:24-cv-02787-JAM-CKD

RUMBLE, INC., et al.,
Plaintiffs,
v.
ROBERT A. BONTA, et al.,
Defendants.

Case No. 2:24-cv-03315-JAM-CKD

X CORP.,
Plaintiff,
v.
ROBERT A. BONTA, et al.,
Defendants.

Case No. 2:24-cv-03162-TAM-CKD

1 **STIPULATION**

2 **WHEREAS**, on December 27, 2024 (ECF No. 36), the Court ordered
3 a summary-judgment briefing schedule that was agreed to by all
4 parties then in the case;

5 **WHEREAS**, on December 27, 2024 (ECF No. 37), the Court
6 consolidated *X Corp. v. Bonta*, No. 24-cv-03162-JAM-CKD with *Kohls*
7 *v. Bonta*, No. 24-cv-02527-JAM-CDK;

8 **WHEREAS**, all parties to these cases agree and respectfully
9 request that *X Corp.* join the summary-judgment briefing schedule
10 set forth at ECF No. 36;

11 **NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED**, by and
12 between counsel for the parties and subject to Court approval, that
13 *X Corp.* join the summary-judgment briefing schedule set forth at
14 ECF No. 36.

15
16
17
18
19
20
21
22
23
24

1 Dated: January 7, 2025

2 By: /s/ Joel Kurtzberg
3 CAHILL GORDON & REINDEL LLP
4 Joel Kurtzberg (admitted *pro
hac vice*)
5 Floyd Abrams (admitted *pro hac
vice*)
6 Jason Rozbruch (admitted *pro
hac vice*)
7 32 Old Slip
8 New York, NY 10005
9 Phone: 212-701-3120
10 Facsimile: 212-269-5420
11 jkurtzberg@cahill.com

12 DOWNEY BRAND LLP
13 William R. Warne (SBN 141280)
14 Meghan M. Baker (SBN 243765)
15 621 Capitol Mall, 18th Floor
16 Sacramento, CA 95814
17 Phone: 916-444-1000
18 Facsimile: 916-520-5910

19 *Attorneys for Plaintiff X
Corp.*

20 /s/ Adam E. Schulman
21 (authorized 01.03.25)
22 HAMILTON LINCOLN LAW INSTITUTE
23 Adam E. Schulman
Theodore H. Frank
1629 K Street NW, Suite 300
Washington, DC 20006
Phone: 610-457-0856
Facsimile: 703-203-3848
adam.schulman@hlli.org
ted.frank@hlli.org

24 *Attorneys for Plaintiff
Christopher Kohls*

25 /s/Johannes Widmalm-Delphonse
26 (authorized 01.04.25)
27 ALLIANCE DEFENDING FREEDOM
28 Johannes Widmalm-Delphonse
44180 Riverside Parkway
Lansdowne, VA 20176
Phone: 571-707-4655
jwidmalmdelphonse@ADFlegal.org

29 ALLIANCE DEFENDING FREEDOM
30 Jonathan A. Scruggs
15100 N. 90th Street
31 Scottsdale, AZ 85260

Phone: 480-444-0020
Facsimile: 480-444-0028
jscruggs@ADFlegal.org

32 CHAVEZ-OCHOA LAW OFFICES, INC.
33 Brian R. Chavez-Ochoa (SBN
190289)
34 4 Jean Street, Suite 4
35 Valley Springs, CA 95252
36 Phone: 209-772-3013
37 brianr@chavezochaoalaw.com

38 *Attorneys for Plaintiffs The
39 Babylon Bee, LLC and Kelly
40 Chang Rickert*

41 /s/ Mathew W. Hoffmann
42 (authorized 01.04.25)
43 ALLIANCE DEFENDING FREEDOM
44 Mathew W. Hoffmann
45 Philip A. Sechler
46 44180 Riverside Parkway
47 Lansdowne, VA 20176
48 Phone: 571-707-4655
49 Facsimile: 571-707-4656
50 mhoffmann@ADFlegal.org
psechler@ADFlegal.org

51 ALLIANCE DEFENDING FREEDOM
52 Mercer Martin
53 15100 N. 90th Street
54 Scottsdale, AZ 85260
55 Phone: 480-444-0020
56 Facsimile: 480-444-0028
57 mmartin@ADFlegal.org

58 CHAVEZ-OCHOA LAW OFFICES, INC.
59 Brian R. Chavez-Ochoa (SBN
190289)
60 4 Jean Street, Suite 4
61 Valley Springs, CA 95252
62 Phone: 209-772-3013
63 brianr@chavezochaoalaw.com

64 *Attorneys for Plaintiffs
65 Rumble Inc. and Rumble Canada
66 Inc.*

1 /s/ Kristin A. Liska
2 (authorized 01.06.25)
3 Rob Bonta
4 Attorney General of California
5 Anya M. Binsacca
6 Supervising Deputy Attorney
7 General
8 Kristin A. Liska
9 Deputy Attorney General (SBN
10 315994)
11 455 Golden Gate Avenue, Suite
12 11000
13 San Francisco, CA 94102-7004
14 Phone: 415-510-3916
15 Facsimile: 415-703-5480
16 Kristin.Liska@doj.ca.gov

17 *Attorneys for Defendants*
18 *Robert A. Bonta and Shirley N.*
19 *Weber*

1 **PROOF OF SERVICE**

2 I hereby certify that I caused to be filed a true and accurate
3 copy of the foregoing document with the Clerk of Court using the
4 CM/ECF system, which automatically sends an electronic notification
5 to all attorneys of record in this case.

6

7 Dated: January 7, 2025

8

9 By: /s/ William R. Warne
10 DOWNEY BRAND LLP
11 William R. Warne (SBN 141280)
12 621 Capitol Mall, 18th Floor
13 Sacramento, CA 95814
14 Phone: 916-444-1000
15 Facsimile: 916-520-5910

1 CAHILL GORDON & REINDEL LLP
2 JOEL KURTZBERG (admitted *pro hac vice*)
3 FLOYD ABRAMS (admitted *pro hac vice*)
4 JASON ROZBRUCH (admitted *pro hac vice*)
5 32 Old Slip
6 New York, New York 10005
7 Phone: 212-701-3120
8 Facsimile: 212-269-5420
9 jkurtzberg@cahill.com

6 DOWNEY BRAND LLP
7 WILLIAM R. WARNE (SBN 141280)
8 MEGHAN M. BAKER (SBN 243765)
9 621 Capitol Mall, 18th Floor
Sacramento, CA 95814
Phone: 916-444-1000
Facsimile: 916-520-5910

10 *Attorneys for Plaintiff X Corp.*

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

CHRISTOPHER KOHLS,
Plaintiff,
v.

ROBERT A. BONTA, et al.,
Defendants.

THE BABYLON BEE, LLC, et al.,

Plaintiffs,

ROBERT A. BONIA, et al.,
Defendants.

RUMBLE, INC., et al.,
Plaintiffs
v.

ROBERT A. BONTA, et al.,
Defendants.

X CORP.,
Plaintiff,
v.
ROBERT A. BONTA, et al.,
Defendants

Case No. 2:24-cv-02527-JAM-CKD

ORDER FOR X CORP. TO JOIN
SUMMARY-JUDGMENT BRIEFING
SCHEDULE

Judge: John A. Mendez

Case No. 2:24-cv-02787-JAM-CKD

Case No. 2:24-cv-03315-JAM-CKD

Case No. 2:24-cv-03162-JAM-CKD

1 Before the Court are Plaintiff X Corp., Plaintiff Christopher
2 Kohls, Plaintiffs The Babylon Bee, LLC and Kelly Chang Rickert,
3 Plaintiffs Rumble Inc. and Rumble Canada Inc., and Defendants Rob
4 Bonta and Shirley N. Weber's joint stipulation for X Corp. to join
5 the summary-judgment briefing schedule ordered on December 27, 2024
6 (ECF No. 36).

7 Good cause appearing, the Court ORDERS that Plaintiff X Corp.
8 follow the summary-judgment briefing schedule set forth at ECF No.
9 36.

10 IT IS SO ORDERED.

11 Dated: January 10, 2025

12 /s/ John A. Mendez

13 THE HONORABLE JOHN A. MENDEZ
14 SENIOR UNITED STATES DISTRICT JUDGE